

December 3, 2020

By ECF and Email

Honorable Paul A. Engelmayer
United States District Judge
Eastern District of New York¹
40 Foley Square
New York, NY 10007

Re: *United States v. Lucio Celli*, 19 Cr. 127 (PAE)

Your Honor:

I write with the consent of the government and Pretrial Services respectfully to request that Mr. Celli's bond be modified to remove the term "no internet access" and replace it with the following condition:

No internet access unless explicitly authorized in advance by Pretrial Services for court appearances, Pretrial Supervision, or other matters deemed essential and appropriate by Pretrial Services. All internet access remains disallowed from Mr. Celli's residence. Pretrial Services may authorize Mr. Celli to travel to a location for the purpose of accessing the internet in accordance with this and other terms of his release.

This condition will permit Mr. Celli to use Skype from his brother's house for the December 15, 2020 conference with the Court. It will also allow him to travel to his brother's house to Facetime with Pretrial Services in lieu of in-person meetings if the pandemic becomes more severe over the winter. And it provides Pretrial Services discretion to authorize any other remote meeting (*e.g.*, a doctor's appointment) during the pandemic.

I have conferred with Pretrial Services Officer Michael Dorn and Assistant United

¹ Sitting by designation.

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States Attorney Anna Karamigios, and they consent to this modification. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman

cc: Counsel of record (by ECF)
Pretrial Services Officer Michael Dorn (by email)
Pretrial Services Officer Leo Barrios (by email)